



September 8, 2017

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Via E-Filing

Honorable James B. Clark, III, U.S.M.J.
United States District Court
District of New Jersey
U.S. Postal Office & Courthouse
2 Federal Square
Newark, NJ 07101

Re: Donna Imbemba v. Woodbridge VF, LLC et al
Civil Case No.: 2:17-cv-01454
Our File No. 13449.00406

Dear Judge Clark:

We represent Defendant Woodbridge UE, LLC in connection with the above-referenced matter. Pursuant to our recent discussion with Your Honor's Law Clerk, we are submitting the enclosed proposed consent order for leave to file a third party complaint against proposed third party defendant Garden Irrigation. Plaintiff's counsel and co-defendant Wal-Mart's counsel have consented to the impleading of Garden Irrigation. Also, attached as Exhibit 1, is the proposed third party complaint. If the proposed consent order and third party complaint is acceptable, we would request that Your Honor enter the Order and we will proceed with filing of the third party complaint. Your Honor's consideration is appreciated.

Very truly yours,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER, LLP

s/Gregory T. Foote
Gregory T. Foote

cc: Brittany M. Murray, Esq., Cottrell Solensky, P.A. – via e-mail w/encls.
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